

EXHIBIT E

From: Deeva V. Shah <dshah@keker.com>
Sent: Wednesday, May 12, 2021 3:03 PM
To: McGonagle, Dan; Singular
Cc: abhansali@kblfirm.com; mkwun@kblfirm.com; wgs-singularv.google@wolfgreenfield.com; nhueston@kblfirm.com; kvpsingular@keker.com
Subject: RE: Singular Computing LLC v. Google LLC; Case No. 1:19-cv-12551 FDS | Discovery Service
Attachments: 05 04 2021 letter to Prince Lobel.pdf

Counsel,

Thanks for your email. We are happy to meet and confer about Google's responses to Singular's Third Set of Interrogatories, which seek information related to Singular's damages claim. However, as I explained in my May 4, 2021 letter, Singular has to date failed to make any meaningful disclosures about its damages theories or the fact underpinning them. In my May 4 letter, we asked Singular to supplement its initial disclosures and response to Interrogatory No. 5 to provide that information. Even though we asked Singular to provide those supplemental disclosures by May 11 (yesterday), we have yet to receive any response at all to my letter.

Singular's failure to provide adequate disclosures about its damages claim is improper, and we believe it must be remedied before the parties can have a productive meet and confer over damages issues, including the discovery requested in Singular's Third Set of Interrogatories. Accordingly, we believe a meet and confer over Google's responses to those requests is premature, and we propose that the parties schedule that meet and confer to occur after Google has received and reviewed Singular's supplemental disclosures and response to Interrogatory No. 5. Please let us know when you plan to supplement Singular's disclosures and interrogatory response, and we will propose times that we are available to meet and confer following our receipt of the same.

Regards,
Deeva

Deeva Shah
757-553-8301

From: McGonagle, Dan <dmcgonagle@princelobel.com>
Sent: Tuesday, May 11, 2021 4:07 PM
To: Alisa Thompson <ATHompson@keker.com>; singular@princelobel.com
Cc: abhansali@kblfirm.com; mkwun@kblfirm.com; wgs-singularv.google@wolfgreenfield.com; nhueston@kblfirm.com; kvp-singular <kvpsingular@keker.com>
Subject: RE: Singular Computing LLC v. Google LLC; Case No. 1:19-cv-12551 FDS | Discovery Service

[EXTERNAL]

Counsel,
Please provide some times that you are available for a meet and confer regarding your responses.

Thanks,
Dan

From: Alisa Thompson [<mailto:athompson@keker.com>]
Sent: Friday, May 7, 2021 6:31 PM
To: Singular <Singular@princelobel.com>
Cc: abhansali@kblfirm.com; mkwun@kblfirm.com; wgs-singularv.google@wolfgreenfield.com; nhueston@kblfirm.com;

Subject: Singular Computing LLC v. Google LLC; Case No. 1:19-cv-12551 FDS | Discovery Service

Dear Counsel:

Attached please find:

- DEFENDANT'S RESPONSE AND OBJECTION TO PLAINTIFF'S THIRD SET OF INTERROGATORIES (NO. 12-20)

Regards,

Alisa Thompson

Legal Secretary

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